

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THOMAS SCHANSMAN, individually, as surviving	:	Index No. 1:19-CV-02985
Parent of QUINN LUCAS SCHANSMAN, and as	:	(ALC) (GWG)
legal guardian on behalf of X.S., a minor, and	:	
	:	Hon. Andrew L. Carter, Jr.
CATHARINA TEUNISSEN, individually, and as	:	
surviving Parent and personal representative of the	:	NOTICE OF MOTION TO
ESTATE OF QUINN LUCAS SCHANSMAN, and	:	DISMISS
	:	
NERISSA SCHANSMAN, individually, and as	:	<b><u>ORAL ARGUMENT</u></b>
surviving Sibling of QUINN LUCAS	:	<b><u>REQUESTED</u></b>
SCHANSMAN,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
SBERBANK OF RUSSIA PJSC, THE WESTERN	:	
UNION COMPANY, WESTERN UNION	:	
FINANCIAL SERVICES, INC., MONEYGRAM	:	
INTERNATIONAL, INC., MONEYGRAM	:	
PAYMENT SYSTEMS, INC., and VTB BANK	:	
PJSC,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and declaration of John S. Kiernan, executed on September 19, 2019, and upon all prior pleadings and proceedings herein, the undersigned, attorneys for Sberbank of Russia (“Sberbank”), hereby moves this Court for an order dismissing the Complaint (ECF No. 1) as to Sberbank, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) for lack of personal jurisdiction and failure to plead legally sustainable claims under the

Anti-Terrorism Act, 18 U.S.C. § 2331 *et seq.*, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
September 19, 2019

DEBEVOISE & PLIMPTON LLP

By: /s/ John S. Kiernan

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